

## Information Quality Guidelines (IQG) Processes U.S. Environmental Protection Agency (EPA)

### General Information

- The Information Quality Act was enacted in December 2000 as Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year (Public Law 106-554).
- The Act required the Office of Management and Budget (OMB) to issue guidance to federal agencies to ensure the “quality, objectivity, utility, and integrity” of information disseminated to the public.
- OMB’s *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* were issued in February 2002 (67 FR 8452).
- The Act also required each federal agency to issue its own information quality guidelines and to establish administrative mechanisms to allow affected persons to request the correction of information disseminated by federal agencies if the information does not comply with OMB’s guidance.
- EPA’s *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency*, referred to as the *EPA Information Quality Guidelines* (IQG), were issued in October 2002 (67 FR 63657) and provide policy and procedural guidance on how EPA ensures the quality of its disseminated information.
- EPA’s IQG references existing Agency policy and procedures, such as those regarding Peer Review and the Action Development Process, and describes the administrative mechanism by which the public can request corrections to information disseminated by the Agency.
- Members of the public can submit an initial Request for Correction (RFC) challenging the quality of information disseminated by EPA and a follow-up Request for Reconsideration (RFR) if not satisfied with the Agency’s response to the RFC.
- EPA’s Enterprise Quality Management Division (EQMD), located within the Office of Environmental Information/Office of Enterprise Information Programs, receives RFCs and RFRs on behalf of the Agency and facilitates the processes for reviewing and responding to requesters.
- EPA’s Internet site for the Quality Program provides information about previous RFCs and RFRs dating from 2005 to the present.

### Request for Correction

- The response to an RFC is developed in collaboration with the EPA organization(s) or “information owner” responsible for disseminating the product or service, as well as with the IQG Attorney Advisor from the Office of General Counsel (OGC). Other EPA experts may be identified and involved on a case by case basis.
- Once the draft response to an RFC has been developed by the information owners, it undergoes review for completeness and adequacy by EQMD and General Council staff before being submitted to the Office of Management and Budget (OMB) for review. Once finalized, the response to the RFC is issued by the Agency’s information owner(s).
- EPA’s Chief Information Officer (CIO) is briefed throughout the process and receives a courtesy copy of the final response. EPA’s goal is to respond to an RFC within 90 days of receiving it. If not achievable, 90-day interim responses are provided to the requester informing him/her about the status of the request.

## Request for Reconsideration

- If dissatisfied with EPA's decision on an RFC, a requester may submit a Request for Reconsideration (RFR) to the Agency within 90 days and provide any new information for reconsideration by the Agency.
- When an RFR is submitted, EPA convenes an Executive Panel consisting of the CIO, the Economics Advisor and the Science Advisor to reconsider EPA's response to the RFC and make a decision on the RFR.
- If there is a conflict of interest for a member of the Executive Panel, the CIO has the authority to select an alternate representative. (Note: in the 'eyes' of the IQG, if a member of the Executive Panel was the Information Owner on the original RFC, that member would be replaced on the Executive Panel)
- The Executive Panel examines the information provided by the requester and determines whether the EPA information owners' response to the RFC complied with OMB and EPA Information Quality Guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of the disseminated Information challenged in the RFC.
- The Executive Panel carefully considers applicable policy, scientific and legal issues to ensure transparency and credibility in the Agency's response to the RFR.
- The Executive Panel's response to the RFR is reviewed by OMB before the response to the RFR is issued by the Agency.

## For Internal Informational Purposes (regarding two items mentioned in the incoming congressional letter)

- **Request for correction to the IRIS Toxicological Assessment of Chloroprene (RFC 17002).** On June 26, 2017, EPA received a request on behalf of Denka Performance Elastomer LLC (DPE) for correction to the 2010 IRIS Toxicological Review of Chloroprene. On October 30, 2017, EQMD facilitated a technical meeting between the information owners, the Office of Research and Development (ORD) and representatives from DPE. The face-to-face meeting provided the opportunity for DPE to present its information and concerns to EPA and learn about EPA's process for responding to the RFC. EPA is in the process of developing a response, which is due by January 31, 2018. ([https://www.epa.gov/sites/production/files/2017-06/documents/2017-06-26-request\\_for\\_correction.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/2017-06-26-request_for_correction.pdf))
- **Requests for correction to the IRIS Toxicological Assessment of Trichloroethylene (RFC 14001 & RFR 14001A).** On November 5, 2013, Halogenated Solvents Industry Alliance (HSIA) submitted a request for correction to the IRIS Reference Concentration (RfC) and Reference Dose (RfD) reported for Trichloroethylene. EPA denied the request for correction. On June 17, 2015, HSIA requested that EPA reconsider its decision. The Executive Panel reconsidered the information and upheld the response to the RFC, sending its response to the requester on February 26, 2016. (<https://www.epa.gov/sites/production/files/2016-03/documents/14001a-response.pdf>)
- **Request for Correction to the TSCA assessment of Trichloroethylene (RFC #16001 and RFR #16001A).** On October 6, 2015, Halogenated Solvents Industry Alliance (HSIA) submitted a request for correction to the chemical risk assessment of TCE, as described in the Toxic Substances Control Act (TSCA) Work Plan issued by the EPA Office of Chemical Safety and Pollution Prevention. The submitted RFC contained the same argument and reference material as the preceding RFC challenging the IRIS assessment of TCE (RFC #14001 and RFR # 14001A). The RFC was denied and a response sent November 4, 2016. A subsequent RFR was submitted by the requester, appealing the response on May 26, 2017. EPA is still

processing this latest RFR. ([https://www.epa.gov/sites/production/files/2017-06/documents/request\\_for\\_reconsideration.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/request_for_reconsideration.pdf))